LOWENSTEIN SANDLER PC

Attorneys at Law

DAVID M. WISSERT Associate

Tel 973.597.2560 Fax 973.597.2561 dwissert@lowenstein.com

April 20, 1998

VIA CERTIFIED MAIL (RETURN RECEIPT REQUESTED)

American Excess Insurance Company One Liberty Plaza 91 Liberty Street New York, NY 10006

Re:

Potential Claim for Environmental Damage in the

Coeur d'Alene Basin, Northern Idaho

Insured: Group R Co., Inc.

Policy No.: EUL 5075781 (8/31/80-2/1/82)

Dear Sir or Madam:

We write on behalf of Group R Co., Inc. ("Group R"). Group R is the successor by merger to the Golconda Corporation (formerly known as the Golconda Lead Mines, Inc. (from 1927-1962) and the Golconda Mining Corporation (from 1962-1970)) and was formally known as the RegO Company (from 1977-1978) ("RegO") and RegO Group, Inc. (from 1978-1992) ("RegO Group"). From 1974 through 1976, Cerro Corporation ("Cerro") owned approximately 85% of the shares in Golconda Corporation. In 1976, Cerro was merged into the Cerro-Marmon Corporation ("Cerro-Marmon") and Cerro-Marmon continued to hold an 85% interest in Golconda. In 1977, Cerro-Marmon changed its name to The Marmon Group, Inc. ("Marmon Group") and continued to own 85% of Golconda/RegO/RegO Group until 1985, when Marmon Group purchased the outstanding 15% of stock in RegO Group and became the owner of 100% of the stock.

On or about August 29, 1997, the United States Department of Justice and the Coeur d'Alene Tribe filed motions in the United States District Court for the District of Idaho seeking leave to amend their complaints to add Group R as a defendant and seeking contribution pursuant to CERCLA toward the cleanup costs of the Coeur d'Alene mining district in Northern Idaho as well as Natural Resource Damages. A copy of those motions are attached for your information.



LS 003972

65 Livingston Avenue

Roseland New Jersey 07068-1791



Telephone 973.597.2500 Fax 973.597.2400

www.lowenstein.com

Your company provided insurance coverage to either Golconda Corporation, Cerro, Cerro-Marmon, the Marmon Group, Marmon Holdings, Inc., the Pritzker Interests (including all divisions, subsidiaries and affiliates thereof) and/or Group R which obligates it to both defend and indemnify Group R against this claim. Kindly acknowledge your receipt of this notice and your acknowledgment of your defense and indemnity obligations by sending a written letter to Michael David Lichtenstein, Esq., Lowenstein, Sandler, Kohl, Fisher & Boylan, 65 Livingston Avenue, Roseland, New Jersey 07068.

Should you have any questions please do not hesitate to contact or Michael David Lichtenstein of this office.

Very truly yours,

MDL/nap

M2377/59 04/20/980510532.01 Enclosure

cc:

William T. Sweeney (The Marmon Group, Inc.) (w/o encls.)

Michael L. Rodburg, Esq. (w/o encls.)

Mcchsell

Michael David Lichtenstein, Esq. (w/o encls.)

